## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

UNITED STATES OF AMERICA

v. CRIMINAL NO. 1:24cr83-TBM-BWR-1

TYLER SURLA

## MOTION TO CONTINUE TRIAL

COMES NOW the defendant, Tyler Surla, and respectfully requests that the trial in this matter be continued to the next trial calendar.

I.

On June 5, 2025, the Federal Public Defender was appointed as counsel for Mr. Surla. Trial in this matter is set for the calendar beginning August 4, 2025, with a pretrial conference on July 22, 2025, and a change of plea notification deadline on July 15, 2025.

II.

At this time, counsel has met with Mr. Surla to discuss the charges against him, as well as reviewed the discovery provided by the Government. However, the undersigned submits additional time is needed to investigate the charges and prepare a defense. For the foregoing reason, the undersigned respectfully requests that the trial be continued to the next court term.

III.

The undersigned contacted Assistant United States Attorney Lee Smith who has no objection concerning the requested continuance.

IV.

The defendant agrees that the period of this continuance be excluded from computations of time for purposes of the Speedy Trial Act.

V.

The Defendant submits that the requested continuance will serve the ends of justice and is not sought for purposes of delay.

WHEREFORE PREMISES CONSIDERED, the Defendant respectfully requests that his Motion be granted and for such other and further relief that the Court deems just and proper.

Respectfully submitted this the 15th day of July 2025.

TYLER SURLA, Defendant

By: /s/Leilani L. Tynes

Leilani L. Tynes, MB #100074 Assistant Federal Public Defender Southern District of Mississippi 2510 14<sup>th</sup> Street, Suite 902

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## **CERTIFICATE OF SERVICE**

I, Leilani L. Tynes, do hereby certify that I have this day electronically filed the foregoing Motion with the Clerk of the Court using the ECF system, which sent notification of such filing to the Assistant United States Attorney Lee Smith.

This the 15th day of July 2025.

/s/Leilani L. Tynes
Assistant Federal Public Defender